



May 1, 2023

MEMO ENDORSED.

By ECF

Hon. Ona T. Wang
United States District Court
Southern District of New York
500 Pearl Street
New York, NY

Re: ***JoySuds, LLC v. N.V. Labs, Inc.*, No. 22-cv-03781 – Joint Motion to Extend**

Dear Magistrate Wang:

Pursuant to Section 1(e) of Your Honor's Individual Practices in Civil Cases, we submit this joint letter motion on behalf of both parties to request an extension of certain dates and increase the number of depositions in the Rule 26(f) Report signed by Your Honor on October 18, 2022 (ECF 69) later amended by the first extension request granted on March 31, 2023 (ECF 90), ("Schedule").

This is the parties second request for the adjournment of dates. Under the current Schedule, fact discovery shall be completed by June 30, 2023, and expert discovery shall be completed by August 14, 2023, and the parties shall have six (6) fact depositions each.

In view of additional discovery requests from the parties and the need for additional witness testimony beyond six (6) as stated in our CMP, the parties respectfully request a one-month extension of fact discovery, to be completed by July 31, 2023, and expert discovery to be completed by September 15, 2023. The parties also request that the number of witnesses be increased to eight (8), over a six (6) day period.

Respectfully submitted,

/s/*Anne Marie Bowler*
Anne Marie Bowler

Application GRANTED. The fact discovery deadline is extended to July 31, 2023. The expert discovery deadline is extended to September 15, 2023. The parties' number of witnesses is increased to eight.

Ona T. Wang 5/2/23
U.S.M.J.